



Re: Seward
 Russ Maddox
 to:
 Evans, Wallace A \(\DEC\) , John Pavitt
 11/17/2011 04:41 PM
 Cc:
 "Baumgartner, James R \(\DEC\) "
 Hide Details
 From: Russ Maddox <russmaddox@Exemption 6>
 To: "Evans, Wallace A \(\DEC\) " <wallace.evans@alaska.gov>, John
 Pavitt/R10/USEPA/US@EPA,
 Cc: "Baumgartner, James R \(\DEC\) " <jim.baumgartner@alaska.gov>
 Please respond to Russ Maddox <russmaddox@Exemption 6>

Hi Wally et al,

Thank you for your thoughtful response. I have been back to the facility every day this week observing the snow on the ground up and downwind of the facility. Since Monday when I took the video the snow has all but disappeared, both what was blackened and what had remained clean, up and downwind. These strong winds are very abrasive and effectively ground and drove all snow and any particulates captured in the snow out to sea over the course of the past four days of high winds. I am not sure what this physical process would be called, something like abrading (?), but even with temperatures remaining well below freezing the coal dust was only temporarily captured in the snow until both coal dust and snow blew away. Since the last ship left Sunday and the winds began there have been two full trains unloaded during high winds. They are to their credit using their mister on the stacker-reclaimer and it appears effective within a tight perimeter but the high winds and dry conditions cause coal dust outside that circle to blow with zero containment. All coal dust that escapes the facility winds up in the bay whether transported by stormwater or carried by winds. Every gust of wind kicks up a visible coal dust cloud and will until they decide to wet the piles in dry and windy conditions. I toured the Westshore coal export facility in BC last summer and they have tall masts with huge foggers all around the stockpiles that automatically come on when humidity drops and winds stir. And that facility is miles across the sound from any community and even with that separation and high-tech containment the community miles downwind is still plagued with coal dust. With our facility smack dab in the middle of our community it seems only logical that we should have the best available technologies and best management practices to minimize our coal dust exposure. Each time they choose to unload trains in high winds they are consciously choosing profit and convenience over risk to public health and environmental degradation.

Thanks for all of your efforts on behalf of our environment.

Regards, Russ

From: "Evans, Wallace A (DEC)" <wallace.evans@alaska.gov>
To: Russ Maddox <russmaddox@Exemption 6> pavitt.john@epa.gov
Cc: "Baumgartner, James R (DEC)" <jim.baumgartner@alaska.gov>
Sent: Thursday, November 17, 2011 4:17 PM
Subject: RE: Seward

Mr. Maddox, thank you for taking the time to share your video and insight with the Department. I would like to let you know I have sent an inquiry to the ARR regarding their efforts to control dust during the past wind events. As you know, they are required to reasonably attempt to contain the dust per their best management dust control plan. This includes watering, operation closure etc. during times of high dust potential. As you can imagine during some conditions it may not be feasible or effective to employ these practices. As you also know, the ARRSCT has their own complaint process which I encourage you to utilize along with the notifications to the Department.
 Thank you for your concerns and I will monitor the situation.

Wally Evans
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From: Russ Maddox [<mailto:russmaddox@Exemption 6>]
Sent: Tuesday, November 15, 2011 10:04 AM
To: Evans, Wallace A (DEC); pavitt.john@epa.gov
Subject: Seward

<http://vimeo.com/32104765>

Hi Wally and John,

I made this rough video yesterday. It shows how clean the snow is upwind and filthy with coal dust it is downwind.

A full ship had just left. Empty trains headed north again. Had snowed four days prior. Gusty WNW winds blew coal dust SSE across the RR's dock blackening it to the water's edge since it last snowed. Normally its a more northerly wind blowing it more south over the harbor and town. The forecast is clear and cold with gusty north winds which will now likely blow coal dust from the flattened stockpiles over the harbor and town. I'll be watching and recording it as it accumulates/spreads on the still somewhat fresh snow. I am not sure of the next ship's due date so there is no way to predict if they will be attempt hauling in these "dust generating" conditions.

With these north winds kicking up I expect the harbor area will be dusted now. I'll do my best to capture images. Please do whatever you can to get them to wet the piles to lay down the dust.

Even with the stockpiles reduced to ground level and zero activity the coal dust is still blowing off site. Without sprinklers on the stockpiles it will never stop and with ever increasing volume passing through can only increase the dust levels.

Thanks for all of your efforts on behalf of our environment.

Regards, Russ